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COOLIT SYSTEMS, INC. and Defendants  
CORSAIR GAMING, INC. and CORSAIR  
MEMORY, INC.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

ASETEK DANMARK A/S,  
  
Plaintiff and  
Counter-defendant,  
  
v.  
  
COOLIT SYSTEMS, INC.,  
  
Defendant and  
Counter-claimant,  
  
CORSAIR GAMING, INC. and CORSAIR  
MEMORY, INC.,  
  
Defendants.

Case No. 3:19-cv-00410-EMC

**DECLARATION OF REUBEN H. CHEN IN  
SUPPORT OF DEFENDANTS' MOTION TO  
EXCLUDE CERTAIN OPINIONS OF DR.  
DAVID B. TUCKERMAN REGARDING  
INVALIDITY OF THE ASSERTED COOLIT  
PATENTS, NON-INFRINGEMENT OF THE  
ASSERTED COOLIT PATENTS, AND  
INFRINGEMENT OF THE ASSERTED  
ASETEK PATENT**

1 I, Reuben H. Chen, do hereby declare as follows:

2 1. I am an attorney licensed to practice before this Court and all courts of the State of  
3 California, and am a partner with Cooley LLP, counsel for Defendant and Counter-claimant CoolIT  
4 Systems, Inc. (“CoolIT”), Defendant Corsair Gaming, Inc., and Defendant Corsair Memory, Inc.  
5 (collectively, “Defendants”) in the above-entitled action. I submit this declaration in support of  
6 Defendants’ Motion to Exclude Certain Opinions of Dr. David B. Tuckerman Regarding Invalidity of  
7 the Asserted CoolIT Patents, Non-infringement of the Asserted CoolIT Patents, and Infringement of  
8 the Asserted Asetek Patent. The matters stated herein are based upon my personal knowledge, and if  
9 called as a witness, I would testify as to the following statements.

10 2. Attached hereto as **Exhibit 1** is a true and correct copy of Expert Report of Dr. David  
11 B. Tuckerman Regarding Invalidity of U.S. Patent Nos. 8,743,330; 9,603,284; and 10,274,266, served  
12 November 3, 2021.

13 3. Attached hereto as **Exhibit 2** is a true and correct copy of excerpts of the deposition  
14 transcript of David Tuckerman, Ph.D., conducted on December 20, 2021, including his deposition  
15 errata. Relevant portions of the deposition transcript have been highlighted for the convenience of the  
16 Court.

17 4. Attached hereto as **Exhibit 3** is a true and correct copy of excerpts of the deposition  
18 transcript of David Tuckerman, Ph.D., conducted on December 22, 2021, including his deposition  
19 errata. Relevant portions of the deposition transcript have been highlighted for the convenience of the  
20 Court.

21 5. Attached hereto as **Exhibit 4** is a true and correct copy of excerpts of the deposition  
22 transcript of Andre S. Eriksen, Ph.D., conducted on August 24, 2021. Relevant portions of the  
23 deposition transcript have been highlighted for the convenience of the Court.

24 6. Attached hereto as **Exhibit 5** is a true and correct copy of excerpts of the deposition  
25 transcript of David B. Tuckerman, Ph.D., conducted on March 18, 2022. Relevant portions of the  
26 deposition transcript have been highlighted for the convenience of the Court.

7. Attached hereto as **Exhibit 6** is a true and correct copy of excerpts from the Expert Report of Himanshu Pokharna, Ph.D. in Response to Dr. Tuckerman's Report on Invalidity of U.S. Patent Nos. 8,746,330; 9,603,284; and 10,274,266, served on December 8, 2021.

8. Attached hereto as **Exhibit 7** is a true and correct copy of a document marked as Exhibit 275 at the deposition of David Tuckerman, Ph.D., conducted on December 20, 2021.

9. Attached hereto as **Exhibit 8** is a true and correct copy of the Rebuttal Expert Report of Dr. David B. Tuckerman Regarding Non-Infringement of U.S. Patent Nos. 8,746,330; 9,603,284; and 10,274,266, served on December 8, 2021.

10. Attached hereto as **Exhibit 9** is a true and correct copy of an email from Joel Dion to Robert McCauley, sent on September 11, 2014, with attachment.

11. Attached hereto as **Exhibit 10** is a true and correct copy of excerpts from the U.S. Patent No. 7,971,632 file history, Reply to Office Action, dated December 18, 2008.

12. Attached hereto as **Exhibit 11** is a true and correct copy of excerpts from the Rebuttal Report of Dr. John P. Abraham Regarding Infringement of Asetek Danmark A/S's Asserted Patent Claims, served December 8, 2021.

13. Attached hereto as **Exhibit 12** is a true and correct copy of the Expert Report of Dr. David B. Tuckerman Regarding Infringement of U.S. Patent Nos. 8,240,362; 10,613,601; and 10,599,196, served on November 3, 2021.

14. Attached hereto as **Exhibit 13** is a true and correct copy of Exhibit A-1 Invalidity Claim Chart for U.S. Patent No. 8,743,330, served September 6, 2019.

15. Attached hereto as **Exhibit 14** is a true and correct copy of excerpts from Exhibit B to the Expert Report of Dr. David B. Tuckerman Regarding Invalidity of U.S. Patent Nos. 8,743,330; 9,603,284; and 10,274,266, served November 3, 2021.

16. Attached hereto as **Exhibit 15** is a true and correct copy of excerpts of the Declaration of Donald E. Tilton, Ph.D. from *Asetek Danmark A/S v. CoolIT Systems, Inc.*, IPR2020-00825 (P.T.A.B.), Asetek Exhibit 1003, dated April 10, 2020.

